IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA MARTINSBURG DIVISION

CONNIE OUTEN,

Plaintiff,

v.

DOLGENCORP, INC.,

Defendant.

TAWANA PROCTOR,

Plaintiff,

v.

DOLGENCORP, INC.,

Defendant.

FABRA STEWART,

Plaintiff,

v.

DOLGENCORP, INC.,

Defendant.

KIMBERLY WELLER

Plaintiff,

v.

DOLGENCORP, INC.,

Defendant.

No. 3:09-CV-00020-JPB

No. 3:09-CV-00021-JPB

No. 3:09-CV-00023-JPB

No. 3:09-CV-00022-JPB

AGREED STIPULATION

It is hereby agreed and stipulation by Plaintiffs Connie Outen, Tawana Proctor, Fabra Stewart-Jones, and Kimberly Weller ("Plaintiffs") and Dolgencorp, Inc. ("Defendant" or "Dollar General") (collectively referred to herein as "Parties") that the Parties have reached individual settlements of Plaintiffs' claims, including their individual claims under the Fair Labor Standards Act ("FLSA"). These individual settlements were negotiated at arm's length by experienced counsel who protected the rights of the Parties. The Parties stipulate that the settlements reflect reasonable compromises concerning *bona fide* disputes between them with respect to liability and the amount of same under the FLSA. The Parties further stipulate that the amounts and terms of the individual settlements are full, fair and just compensation for Plaintiffs' claims.

Respectfully submitted this the 23rd day of December, 2010

/s/ Roman A. Shaul

Roman A. Shaul C. Lance Gould (admitted *pro hac vice*)

BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.

272 Commerce Street P.O. Box 4160

Montgomery, AL 36103-4160

Tel: 334.269.2343 Fax: 334.954.7555

roman.shaul@beasleyallen.com lance.gould@beasleyallen.com

Michelle Price Massingale

SELLERS, HINSHAW, AYERS, DORTCH & LYONS, P.A.

301 S. McDowell Street

Suite 410

Charlotte, NC 28204 Tel: 704.377.5050 Fax: 704.339.0172

mmasingale@sellershinshaw.com

ATTORNEYS FOR PLAINTIFFS

/s/ Larissa C. Dean

Larissa C. Dean WV Bar No. 10383

SPILMAN, THOMAS & BATTLE, PLLC

Post Office Box 615

Morgantown, WV 26507-0615

Tel: 304-291-7924 Fax: 304-291-7979 Idean@spilmanlaw.com

Ronald E. Manthey TX Bar No. 12927400 (admitted *pro hac vice*)

Joel S. Allen

TX Bar No. 00795069 (admitted *pro hac vice*)

MORGAN, LEWIS & BOCKIUS LLP

1717 Main Street, Suite 3200 Dallas, TX 75201-7347

Tel: 214-466-4000 Fax: 214-466-4001

ron.manthey@morganlewis.com joel.allen@morganlewis.com

ATTORNEYS FOR DEFENDANT